

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA :

: - v. -

Roman Ramirez,
a/k/a "Palomaro,"
a/k/a "Palomo,"

: INFORMATION

10 Cr. 81 (CM)

: Defendant.

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COUNT ONE

The United States Attorney charges:

1. From in or about January 2008 through in or about July 2009, in the Southern District of New York, ROMAN RAMIREZ, a/k/a "Palomaro," a/k/a "Palomo," the defendant, together with others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated, and agreed to violate the laws of the United States.

2. It was a part and an object of said conspiracy that ROMAN RAMIREZ, a/k/a "Palomaro," a/k/a "Palomo," the defendant, and others known and unknown, would and did unlawfully, willfully, and knowingly, and without lawful authority, produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Sections 1028(a)(1), and (c)(1).

3. It was further a part and an object of said conspiracy that ROMAN RAMIREZ, a/k/a "Palomaro," a/k/a "Palomo,"

the defendant, and others known and unknown, would and did unlawfully, willfully, and knowingly transfer identification documents, authentication features, and false identification documents knowing that such documents and features were stolen and produced without lawful authority, in violation of Title 18, United States Code, Sections 1028(a)(2), and (c)(1).

OVERT ACT

4. In furtherance of the conspiracy and to effect its illegal objects, the following overt act, among others, was committed in the Southern District of New York:

a. On or about May 19, 2009, ROMAN RAMIREZ, a/k/a "Palomaro," a/k/a "Palomo," the defendant, sold five fraudulent Social Security cards in Newburgh, New York.

(Title 18, United States Code, Section 1028(f).)



PREET BHARARA
United States Attorney